

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 16-CR-177

TRAVIS M. KAMPS,

Defendant.

MOTION FOR BOND MODIFICATION

Travis M. Kamps, by counsel, pursuant to 18 U.S.C. § 3142, hereby requests that his bond be modified to allow him to participate as best man in his best friend's wedding over January 20-21, 2017. In support, Mr. Kamps states the following:

1. On November 10, 2017, Mr. Kamps was arraigned on a one count indictment charging him with sexual exploitation of a minor in violation of Title 18 U.S.C. Section 2251(a). A plea of not guilty was entered, and Mr. Kamps was released on a signature bond with the following conditions: report to pretrial services as directed; travel restricted to the state of Wisconsin and must reside at home each evening; avoid all contact with victim or witness; no weapons or other dangerous weapons; refrain from all use of alcohol; participate in location

monitoring with home detention wherein all activities outside of those deemed to be essential must be approved in advance by supervising officer; no unsupervised contact with children under the age of 18 years old; and no internet without prior approval from supervising officer.

2. Counsel spoke with the probation office, and they have confirmed that Mr. Kamps has been fully compliant with all conditions of release, including all terms of location monitoring.

3. A plea agreement has been filed wherein Mr. Kamps is agreeing to plead guilty to an Information charging receipt of child pornography. Pursuant to the terms of the plea agreement, the Indictment will be dismissed at the time of sentencing.

4. Mr. Kamps has been completely cooperative with law enforcement during the investigation of this case which began during the summer of last year. He has met with law enforcement at their request on numerous occasions. Each time, he has been accompanied by family members including his father and/or mother and brothers. Mr. Kamps has always worked in the family business, Statewide Building Services. The company is owned by his father, and he and his two brothers are the only employees. Finally, Mr. Kamps lives at home with his parents and has always lived with them in Seymour. So essentially, at all times during work and home, Mr. Kamps is with another adult family member.

5. Close to two years ago, Mr. Kamps agreed to be the best man in his closest friend's wedding. Mr. Kamps has known this friend since childhood. One of his brothers is also standing up in the wedding. All of his family are attending the wedding. The rehearsal dinner for the wedding is Friday evening, January 20, while the wedding service and reception are January 21, 2017. At no time during either the rehearsal dinner or wedding will Mr. Kamps not be in the presence of his immediate family. With that in mind, Mr. Kamps would like the Court's permission for extended time out on location monitoring on both Friday and Saturday to participate in the wedding and rehearsal dinner. Specifically, Mr. Kamps would request his normal schedule to be home by 6:00 p.m. from work be extended to 10:00 p.m. on Friday, January 20, 2017. And for Saturday, January 21, 2017, Mr. Kamps is requesting he be permitted to be scheduled out from 9:00 a.m. to 12:00 p.m (midnight).

6. Counsel has spoken with United States Probation Officer Mitchell Farra regarding this request. USPO Farra indicates that both of these events would require Mr. Kamps to be out on a longer schedule than is normally allowed when a person is subject to location monitoring. For this reason, USPO Farra requested a motion be filed asking the Court's permission to authorize the probation office to extend the time in which Mr. Kamps is permitted to be away from his residence on both January 20 and 21, 2017.

7. Counsel communicated with Assistant United States Attorney Daniel Humble regarding this request, and he has no objection.

WHEREFORE, Travis M. Kamps, respectfully requests the Court grant him permission to extend his time out of location monitoring on both Friday, January 20, 2017, until 10:00 p.m., and Saturday, January 21, 2017, from 9:00 a.m. to 12:00 p.m. (midnight).

Dated at Green Bay, Wisconsin, this 17th day of January, 2017.

Respectfully submitted,

s/ Krista Halla-Valdes

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